REMARKS

Claim rejections under 35 USC 103

Claims 1-3, 7-13, and 23 have been rejected under 35 USC 103(a) as being unpatentable over "JDF Specification Draft Spiral 4.0" [hereinafter, "JDF"] in view of Bacon (6,697,784). Claims 4-5 and 14-16 have been rejected under 35 USC 103(a) as being unpatentable over JDF in view of Bacon, and further in view of Silberschatz ("Operating System Concepts"). Claim 6 has been rejected under 35 USC 103(a) as being unpatentable over JDF in view of Bacon, and further in view of McNally (6,823,513). Claims 17-22 have been rejected under 35 USC 103(a) as being unpatentable over JDF in view of Bacon and Barkley (6,088,679).

Claims 1, 10, 17, and 21 are independent claims, from which the remaining claims ultimately depend. Applicant submits that the independent claims as previously amended are patentable over JDF in view of Bacon (and in view of Barkley in the case of claims 17 and 21), such that all the claims rejected on this basis are patentable. Applicant discusses claim 1 as representative of al the independent claims insofar as patentability over JDF in view of Bacon (and also in view of Barkley) is concerned.

Claim 1 is limited to "a work flow corresponding to [a] job request, and [a] job ticket [related to the print job]." Claim 1 is further limited to "providing [a] job ticket reference to multiple processors such that the multiple processors use the job ticket reference to access the stored job ticket instead of being provided with a copy of at least a portion of the job ticket." It is important to understand the inter-relation between a workflow, a job ticket, a job ticket reference, and processors, to understand what the claimed invention is directed to.

***First, in the claimed invention, there is a workflow corresponding to a print job, and a job ticket related to the print job. Second, a job ticket reference references the job ticket as stored. Third, the processors access the stored job ticket via the job ticket reference, instead of, for instance, receiving a copy of at least a portion of the job ticket. Therefore, it is the processors

in the claimed invention that use the job ticket reference to access the job ticket, as opposed to, for instance, the workflow. (This paragraph is denoted by *** for later reference to it in this discussion.)

JDF in view of Bacon (and also in view of Barkley) does not teach, disclose, or suggest the claimed invention. The Examiner has stated that JDF discloses most aspects of the claimed invention, but does not disclose the limitation that "the multiple processors use the job ticket reference to access the stored job ticket instead of being provided with a copy of at least a portion of the job ticket," in which the Examiner instead finds in Bacon, such that JDF in view of Bacon (and also in view of Barkley) yield the claimed invention. Applicant submits, however, that Bacon in particular does not teach, disclose, or suggest this particular aspect of the claimed invention, such that JDF in view of Bacon (and also in view of Barkley) cannot be considered as teaching, disclosing, or suggesting the claimed invention.

Bacon discloses the following as to sharing a process definition, which the Examiner has corresponded to a job ticket of the claimed invention:

> The preferred implementation instantiates only one processor definition 107, *which is used no matter how many **workflows**, defined by that process, are concurrently executing on server 110. The process definition 107 is effectively shared among the **workflows*** and each flow is kept distinct through proper identification of the associated work items 117. This is in contrast to WfCM specifications which suggest a new "enactment" of a process definition *for each workflow*. The preferred arrangement, by sharing the definition 107, significantly reduces load on the server 110, *thus allowing it to serve more **workflows** concurrently*, and reduces storage requirements on database 125.

(Col. 6, ll. 8-19) In Bacon, and thus in JDF in view of Bacon (and also in view of Barkley), then, what is going on is that a single instance of a process definition/job ticket is shared among *multiple **workflows***. By comparison, in the claimed invention, a single instance of a process definition/job ticket is shared among *multiple **processors***. Indeed, there is only "a work flow" (i.e., a single work flow) mentioned in claim 1. Therefore, Bacon, in discussing multiple workflows sharing a single instance of a process definition/job ticket, is inapposite at best to the

claimed invention, which does not talk about multiple workflows at all, but rather is limited to *multiple processors* sharing a single instance of a process definition/job ticket.

That is, compare what JDF in view of Bacon (and also in view of Barkley) discloses to what the claimed invention is limited to as has been discussed earlier in the paragraph indicated by *** above. First, in JDF in view of Bacon (and also in view of Barkley), there are *multiple workflows* corresponding to a print job, and a process definition/job ticket related to the print job. Second, a process definition/job ticket reference references the process definition/job ticket as stored. Third, the *multiple workflows* access the stored process definition/job ticket via the process definition/ticket reference, instead of, for instance, having to instantiate a copy of the process definition/job ticket for each workflow. Therefore, it is the *multiple workflows* in JDF in view of Bacon (and also in view of Barkley) that use the process definition/job ticket reference to access the process definition/job ticket, as opposed to, for instance, *multiple processors* using the process definition/job ticket reference to access the process definition/job ticket.

Therefore, the process definition/job ticket in JDF in view of Bacon (and also in view of Barkley) is shared insofar as multiple workflows access the same instance or copy of this process definition/job ticket. By comparison, the claimed invention does not discuss multiple workflows at all in its sharing of a process definition/job ticket. Rather, the claimed invention is limited to multiple processors accessing the same instance or copy of a job ticket. *Therefore, where there is a single workflow as in the claimed invention, instead of multiple workflows as identified in the relevant portion of Bacon, JDF in view of Bacon (and also in view of Barkley) is silent as to sharing a process definition/job ticket among multiple processors, and thus cannot be considered as teaching all the claim limitations of the claimed invention.*

For instance, the Examiner concludes that "accordingly, the multiple devices use the job ticket reference to access the job ticket concurrently." (Office action, p. 4) However, this conclusion is not based in what Bacon, and thus JDF in view of Bacon (and also in view of Barkley), teaches. Bacon, and thus JDF in view of Bacon (and also in view of Barkley), simply

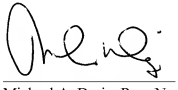
says that where there are *multiple workflows*, such multiple workflows use a job ticket reference to access the same instance or copy of a job ticket. *Bacon is silent as to how multiple devices access a job ticket where there is a single workflow, as in the claimed invention.* Insofar as Bacon is silent as to this salient point of the invention, and JDF teaches providing each devices with a copy of the job ticket (as admitted by the Examiner on page 4 of the Office action), one of ordinary skill within the art properly concludes that JDF in view of Bacon (and also in view of Barkley), where you have a single workflow as in the claimed invention, provides multiple devices each with a copy of the job ticket.

For all of these reasons, JDF in view of Bacon (and also in view of Barkley) does not teach, disclose, or suggest all the claim limitations of the claimed invention. The prior art reference must disclose each element of the claimed invention "arranged as in the claim" for the claimed invention to be unpatentable. (Lindermann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 221 USPQ 481, 485 (Fed. Cir. 1984)) Here, JDF in view of Bacon (and also in view of Barkley) does not teach the elements of the claimed invention arranged as in the claim. The claimed invention is directed to multiple processors sharing a job ticket, where there is just "***a*** workflow" (i.e., a single workflow), whereas JDF in view of Bacon (and also in view of Barkley) is directed to multiple *workflows* sharing a job ticket, and is silent as to how, if, and/or whether multiple *processors* share a job ticket where there is a single workflow.

Conclusion

Applicants have made a diligent effort to place the pending claims in condition for allowance, and request that they so be allowed. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Mike Dryja, Applicants' Attorney, at 425-427-5094, so that such issues may be resolved as expeditiously as possible. For these reasons, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,



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